

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

NORTH AMERICA PHOTON
INFOTECH, LTD.,

Plaintiff,

v.

ACQUIA, INC.,

Defendant.

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Civil Action. No. 1:22-cv-12052 (FDS)

DEFENDANT’S CROSS MOTION TO
COMPEL DISCOVERY AND FOR
SANCTIONS

Defendant Acquia, Inc. (“Acquia”) hereby cross-moves to compel discovery and for sanctions. In support of this motion, Acquia submits herewith a supporting memorandum of law and the Declaration of Irwin B. Schwartz in Opposition to Emergency Motion for Protective Order and in Support of Cross Motion to Compel Discovery and for Sanctions.

Dated: June 4, 2024

Respectfully Submitted,

Acquia Inc.,
By its attorney,

/s/ Irwin B. Schwartz

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CERTIFICATE OF SERVICE

I, Irwin B. Schwartz, as attorney for Defendant Acquia, Inc., hereby certify that on this 4th day of June 2024, I filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Irwin B. Schwartz
Irwin B. Schwartz